

No. 70542-3  
King County Superior Court # 12-2-18714-2 SEA  
IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON  
DIVISION I

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THE CITY OF KIRKLAND, a Washington municipal corporation,  
Appellant,

vs.

POTALA VILLAGE KIRKLAND, LLC, a Washington limited  
liability company, and LOBSANG DARGEY and TAMARA  
AGASSI DARGEY, a married couple,

Respondents.

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MOTION FOR EXTENSION OF TIME TO  
FILE ANSWER TO AMICUS CURIAE BRIEF

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## **MOVING PARTIES**

This Motion is filed by Respondents Potala Village Kirkland, LLC and Lobsang Dargey and Tamara Agassi Dargey (collectively “Dargey”), by and through counsel of record, for an extension of time in which to file their Answer to the amicus curiae brief submitted by Washington State Association of Municipal Attorneys and Futurewise.

## **STATEMENT OF RELIEF SOUGHT**

The Court granted the motion by Washington State Association of Municipal Attorneys and Futurewise to file an amicus curiae brief on Friday, May 16, 2014.


Counsel for Dargey, Duana T. Koloušková, who is solely responsible for handling this case and is the only one in our office familiar with the facts and procedural history of this case, has been out of the country on family vacation in Italy since May 1, 2014, and will not return to the office until Thursday, May 22, 2014. Ms. Koloušková has not had the opportunity to read the amicus curiae brief filed in this matter, nor will have the opportunity to do so until May 22<sup>nd</sup>. Ms. Koloušková additionally has all-day hearings scheduled for Tuesday and Wednesday, May 27<sup>th</sup> and May 28<sup>th</sup>, which will also require pre-hearing preparation time with her clients in those matters. This leaves her almost no time to review the amicus curiae brief and prepare an Answer to by the Court’s deadline of May 28<sup>th</sup>.

## CONCLUSION

Based on the foregoing, counsel for Dargey respectfully requests an extension of the deadline in which to file its Answer to the amicus curiae brief to Monday, June 2<sup>nd</sup>, 2014.

RESPECTFULLY SUBMITTED this 16<sup>th</sup> day of **May**, 2014.

JOHNS MONROE MITSUNAGA  
KOLOUŠKOVÁ, PLLC

By  ~~FOR~~  
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Potala Village Kirkland, LLC, and  
Lobsang Dargey and Tamara Agassi Dargey